

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
SHERMAN DIVISION

UNITED STATES OF AMERICA	§	
	§	No. 4:20-CR-194
v.	§	Judge Jordan
	§	
TONYA WARREN	§	

FACTUAL BASIS

Investigation by the Department of Education, Office of the Inspector General, disclosed the following facts that establish that I, the defendant, **Tonya Warren**, violated 20 U.S.C. § 1097 and violated 18 U.S.C. § 641. I agree the following factual basis is true and correct:

1. I am the same **Tonya Warren** that is named as the defendant in the Information on file in this case.
2. The events and actions described in the Information on file in this case occurred within the Eastern District of Texas and elsewhere.
3. On or about February 8, 2018, **Warren** knowingly and willfully misapplied, stole, and obtained by fraud, false statement, and forgery, funds, assets, and property provided or insured under Title 20, Chapter 28, Subchapter IV of United States Code, specifically under the Federal Direct Student Loan program (“FDSLP”), in that **Warren** made material false statements in order to receive federal funds under the Grad Plus Student Loan program, in an amount exceeding \$200.

4. On or about February 8, 2018, in the Eastern District of Texas and elsewhere, **Warren** did willfully and knowingly did steal and purloin money belonging to the United States, to her own use, the money being in the form of a Grad Plus Loan under the Federal Direct Student Loan Program, of a value exceeding \$1,000, of the goods and property of the United States, and **Warren** did so knowing the money was not hers and with intent to deprive the owner of the use of the money.
5. On or about January 11, 2018, **Warren** made representations and statements in writing to the student financial aid office at University of North Texas in order to request student financial aid in the form of a Grad Plus loan; the Grad Plus loan program is part of the Federal Direct Student Loan Program and the money for Grad Plus loans comes from and belongs to the United States government. These statements included that during the Spring 2018 semester of classes **Warren** would pay dependent care expenses in the amount of \$7,140 for two grandchildren. The statement was in writing and was signed by **Warren** and was relied on by the University of North Texas in determining whether to grant student financial aid to **Warren** under the Grad Plus loan program. The statement was false, and **Warren** knew at the time that **Warren** made the statement that it was false, because in fact **Warren** knew that she would not pay dependent care expenses as **Warren** represented and stated to University of North Texas. Further, after receiving the Grad Plus loan funds, **Warren** did not

in fact pay those expenses as she had represented. To support her request for the funds, **Warren** provided to the University of North Texas a fictitious receipt that **Warren** created to give the appearance she actually would incur the expenses in the amount of \$7,140. The University of North Texas received the statement and documents described above and approved an increase in **Warren's** Grad Plus loan in the amount of \$4,000 to cover the purported dependent care expenses. The Grad Plus funds were in the form of a loan and were federal funds that were transmitted by the United States government to the University of North Texas, and then disbursed to and received by **Warren** (less an administrative fee) on or about February 8, 2018.

6. In addition to the above, during the years 2011 - 2018 **Warren** made other requests for increases in her student loans to the University of North Texas. These requests sought increases in federal Direct student loans for dependent care expenses, both in the form of Unsubsidized student loan funds and Grad Plus student loan funds. These requests also contained false statements, in that **Warren** knew she would not pay or incur the dependent care expenses that **Warren** represented and described to the University of North Texas, and she did not in fact pay those expenses as represented.
7. In addition to the above, on or about April 5, 2018, **Warren** submitted a request to the University of North Texas for Grad Plus student loan funds for what

Warren falsely represented was child care expenses in the amount of \$6,540.


The University of North Texas did not approve this particular request.

8. **Warren** stipulates that the total amount of federal Direct student loan funds, in the form of Unsubsidized student loan funds and in the form of Grad Plus student loan funds, that **Warren** knowingly and willfully misapplied, stole, and obtained by fraud, false statement, and forgery, which she put to her own use, which funds were provided or insured under Title 20, Chapter 28, Subchapter IV of United States Code, specifically under the Federal Direct Student Loan Program, as described in this Factual Basis, was \$42,498.85. This does not include the \$6,540 described in paragraph seven above.
9. I hereby stipulate that the facts described above are true and correct and I accept them as the uncontroverted facts of this case.

Defendant's signature and acknowledgment:

I have read this Factual Basis and have discussed it with my attorney. I fully understand the contents of this Factual Basis and agree without reservation that the facts described above are true and correct and I accept them as the uncontroverted facts of this case.

Dated: 9-2-20

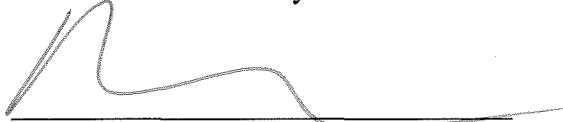

TONYA WARREN
DEFENDANT

Defendant's counsel's signature and acknowledgment:

I have read this Factual Basis and the separate Plea Agreement in this matter and have reviewed them with my client. Based upon my discussions with my client, I am satisfied that she understands the terms and effects of the Factual Basis and the Plea Agreement and that she is signing this Factual Basis voluntarily.

Dated: _____

9-2-20



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